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September 8, 2022

Via ECF

Hon. Diane Gujarati  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: U.S. v. Alimena, 21 Cr. 00466-DG-JRC-15

Dear Judge Gujarati,

I write on behalf of defendant Albert Alimena, to request a modification of the protective order regarding discovery. Currently, the protective order only allows our client to review certain discovery in the physical presence of counsel. This has posed significant obstacles to our ability to meaningfully review the discovery with Mr. Alimena, who resides in Florida and must travel to New York to participate in the preparation of his defense. We therefore request that the Court modify the protective order to allow us to mail a hard drive of the relevant discovery material to our client provided that he: (a) signs the confidentiality order (which he has done); and (b) agrees to destroy the hard drive and any copies thereof and/or return them to counsel for destruction.

I have communicated this request to AUSA Devon Lash who advised that the Government consents to this request.

Very truly yours,

/s/ *Jacob Laufer*

JACOB LAUFER

CC: AUSA James McDonald (via ECF)  
AUSA Devon Lash (via ECF)